

From: GeorgeK@Georgesorganics.com
Sent: Tuesday, September 26, 2006 6:05 PM
To: Frances, Valerie
Subject: Organic Yeast

Attachments: ATTACHMENT.TXT

The National Organic Standards Board
c/o Valerie Frances, Executive Director
USDA-AMS-TM-NOP
1400 Independence Avenue SW
Room 4008 – South Building, Ag Stop 0268
Washington, DC 20250-0200

Dear Ms. Frances:

We are writing to give our strong support for the recommendation of the Handling and Materials Committees of the National Organic Standards Board (NOSB) to clarify the definition of “agricultural products” vs. “nonagricultural substances” for ingredients listed on the National List to be allowed in processed products. The Committees have made three recommendations, #1, 2 and 3.

First, we would like to see the full NOSB approve Recommendation #3 to make a technical correction in the National List to move yeast and dairy cultures from Section 205.605(a) (“nonagricultural substances”) to Section 205.606 (“agricultural products”).

Listing yeast on the National List as a “nonagricultural substance” has meant that organic yeast has not been a required organic ingredient in processed products. Instead of organic yeast, manufacturers have been allowed to use a conventional substitute in all cases. Once yeast is properly listed as an “agricultural product,” this will encourage the organic ingredient industry to develop organic yeast products that could be preferred for use in processed products labeled “organic.”

We also support the other recommendations, #1 and #2. Recommendation #1 modifies the definition of “nonagricultural substance” in the NOP regulations to make it consistent with other parts of the NOP regulation and with the Organic Foods Production Act. Finally, Recommendation #2, the “Decision Tree,” will be a useful guide to help manufacturers and certifiers determine whether an ingredient is “nonagricultural” or “agricultural.”

In closing, we wish to thank the Handling and Materials Committees for their patient work in tackling and resolving this important set of questions. These recommendations will be a

valuable contribution to the continued development of necessary organic ingredients.

We thank the NOSB for considering these comments.

George Kalogridis
George's Organics.
P.O. Box 1829
Ojai CA 93024